

3200 Camp Baker Road
Medford, OR 97501

Oct 21, 2007

Western Oregon Plan Revisions
Pox 2965
Portland OR 97208

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RE: Comments to DEIS

I am a professional forester with over 30 years experience in silviculture in southern Oregon. A general comment is a compliment on how well the document is written and presented. It would have been helpful to include a large map showing the watershed names and boundaries relative to major roads, as much of the analysis is done at this level (e.g. invasives).

I am in favor of your Alternative 2, because I think it comes the closest to the O&C Act's intent. I am somewhat concerned with using a blanket prescription for harvest under Alt 2 for all of western Oregon (see Table 1, pg XLIX).

This alternative shows no green tree retention after harvest. In certain areas of the Medford District, which I am very familiar with, this is a recipe for extreme reforestation difficulties. Given that BLM is unlikely to utilize herbicides for reforestation any time soon, it becomes even tougher to have regeneration success on some of these frosty and high-elevation sites. Regeneration failures in the 60's caused lots of criticism and were part of the impetus for the FIR program.

I believe you need to have more flexibility in this alternative, or if it is already there, you need to make it clear. Perhaps another subalternative for these special cases would do it.

Regarding invasive plants and you analysis of the risk of introduction and spread:

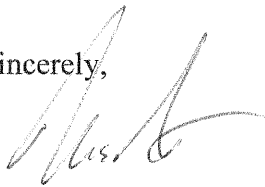
I think you have made a good attempt to quantify the relative risk among your alternatives, but there is so much more that comes into play with these plants, that I would not want your analysis to necessarily jeopardize one alternative over another. The most important statement you make is pg 632, paragraph 2, which I agree with. I believe the focus should be on how certain (not all) invasives are to be controlled on BLM, given that in many areas spread onto BLM is inevitable.

Some plants like Canada thistle, which are very hard to control and tend to fade away with shading, may need to be tolerated at some level during stand establishment, just like mullein and bull thistle. Himalaya berry, which you do not list, is almost impossible to keep from invading because seeds are spread by birds. Although thought of as intolerant, I see plenty of it growing under a conifer canopy and away from water. It can be a real

problem in young plantations, but trying to totally eliminate it is probably unrealistic. On the other hand I believe that scotch broom, with its long-lived seed, needs to be controlled wherever it is found. Weighting all invasives equally may distort the consequences from what they would truly be.

Although your analysis shows Alternative 2 as giving the biggest boost to invasives, half the battle with these plants is knowing where they are. Intensive even-aged reforestation is going to require periodic plantation exams, which will show where problems are with invasives, and then they can be dealt with. I think there is more danger in selection harvests over broad areas that don't need as much monitoring afterwards, giving invasives more of a foothold. I think this should be talked about in your mitigations.

Sincerely,

A handwritten signature in dark ink, appearing to read 'M. Meredith', with a stylized, flowing script.

Michael S. Meredith